

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

JEFFREY ANDERS,
Plaintiff,

Case No. 2:20-CV-00438-BHL

v.

METALCRAFT OF MAYVILLE, INC.,
Defendant.

**CIVIL LOCAL RULE 7(h) EXPEDITED NON-DISPOSITIVE MOTION TO
CONSOLIDATE AND EXTEND PLAINTIFF’S REPLY TO PLAINTIFF’S MOTION TO
DISMISS AND DEFENDANT’S MOTION FOR SANCTIONS**

Pursuant to Civ. L. R. 7(h), Plaintiff respectfully requests the Court grant this motion to consolidate Plaintiff’s reply to their pending motion to dismiss and response to Defendant’s pending motion for sanctions and extend time by ten days for Plaintiff to file its consolidated reply/response. On January 18, 2022, Plaintiff filed their pending motion to dismiss the above-captioned matter with prejudice and without further costs or attorneys’ fees to either party. On February 1, 2022, Defendant filed its response to Plaintiffs’ motion to dismiss and separately filed a motion for sanctions pursuant to Fed. R. Civ. P. 11. Defendant’s motion for sanctions and response to Plaintiff’s motion for dismissal are inextricably linked as Defendant relies on its motion for sanctions and supporting brief to supports its position in response to Plaintiff’s motion to dismiss. Consolidating Plaintiff’s reply/response to these motions will allow for a more efficient resolution of these issues than requiring the submission of separate briefs that largely cover related issues. In addition, given the severity of Defendant’s allegations, Plaintiff and Plaintiff’s Counsel require additional time to explore the possibility of obtaining sanctions counsel to respond to Defendant’s motion.

Accordingly, Plaintiff requests that the Court enter an Order:

- 1) providing that Plaintiff shall file one brief totaling up to 30 pages in reply to Defendant's response to Plaintiff's pending motion to dismiss as well as in response to Defendant's motion for sanctions by no later than March 4, 2022; or
- 2) Alternatively, setting a status conference to discuss scheduling in this matter.

Dated this 7th day of February 2022.

Respectfully submitted,

s/ Timothy P. Maynard

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